

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

**IN RE: BROILER CHICKEN GROWER
ANTITRUST LITIGATION (NO II)**

MDL No. 6:20-2977-RJS-CMR

Hon. Chief Judge Robert J. Shelby

Hon. Cecilia M. Romero

**PLAINTIFFS' UNOPPOSED MOTION FOR ENTRY OF A SUPPLEMENTAL
SCHEDULE REGARDING PLAINTIFFS' PROPOSED CLASS SETTLEMENT WITH
PILGRIM'S PRIDE CORPORATION**

Now that the Court has issued Orders preliminarily approving the proposed class settlement with Pilgrim's Pride Corporation ("PPC") and notice to the Settlement Class thereof,¹ Plaintiffs move for a supplemental schedule relating to final approval of the Settlement. Plaintiffs hereby submit the following supplemental proposed schedule of events relating to their proposed settlement with PPC. For clarity, this schedule includes the three deadlines (for Commencement of Direct Notice, Commencement of Publication Notice, and for Settlement Class Members to Opt Out of the Class or Object to the Settlement) that were previously set by the Court.² Plaintiffs' proposed supplemental schedule is set forth below:

Event	Timeline
Commencement of Direct Notice to the Class	September 19, 2024³
Commencement of Publication Notice to the Class	September 19, 2024⁴
Submission of motion for attorneys' fees, expenses, and service awards for the class representatives	November 3, 2024⁵

¹ ECF Nos. 617 and 618.

² See ECF No. 618.

³ This deadline is 30 days after the Court's Order approving Plaintiffs' Notice Plan, and was previously set by the Court's August 20, 2024 Order Approving Issuance of Notice to the Settlement Class.

⁴ This deadline is 30 days after the Court's Order approving Plaintiffs' Notice Plan, and was previously set by the Court's August 20, 2024 Order Approving Issuance of Notice to the Settlement Class.

⁵ November 3, 2024 is a Sunday, so by operation of Federal Rule of Civil Procedure 6 Plaintiffs' motion for attorneys' fees, expenses, and service awards would be due on Monday, November 4.

Deadline for Class Members to Opt Out of the Class or Object to the Settlement	December 3, 2024⁶
Plaintiffs' Notice to the Court Identifying Persons or Entities Requesting Exclusion from the Class and Completion of the Notice Program	December 13, 2024⁷
Submission of motion and memorandum in support of final approval of the Settlement Agreements and any responses by parties to any objections filed by any Class members	December 13, 2024⁸
Fairness Hearing ⁹	
Claims Deadline	April 17, 2025¹⁰

Plaintiffs will submit a Proposed Order with the foregoing supplemental schedule concurrently with this Motion.

Dated: August 27, 2024

Respectfully submitted,

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⁶ This deadline is 105 days after the Court's Order approving Plaintiffs' Notice Plan, and was previously set by the Court's August 20, 2024 Order Approving Issuance of Notice to the Settlement Class.

⁷ This deadline is 115 days after the Court's Order approving Plaintiffs' Notice Plan.

⁸ This deadline is 115 days after the Court's Order approving Plaintiffs' Notice Plan.

⁹ On a date to be set by the Court, but no earlier than **January 6, 2025** (139 days after an Order approving the Notice Plan).

¹⁰ This deadline is 240 days after the Court's Order approving Plaintiffs' Notice Plan.

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CERTIFICATE OF SERVICE

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/s/ Kyle Bates
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